

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE NEW YORK TIMES COMPANY and :  
ERICA GREEN, :  
Plaintiffs, :  
: Case No. 19-cv-00693  
- against - :  
U.S. DEPARTMENT OF EDUCATION, :  
Defendant. :  
X

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**DECLARATION OF ALEXANDRA PERLOFF-GILES**

I, Alexandra Perloff-Giles, hereby declare under penalty of perjury as follows:

1. I am an attorney at The New York Times Company (“The Times”).
2. On May 8, 2020, Alexander Hogan, counsel for Defendant Department of Education, sent me an e-mail, stating that he was “attaching here several records that, upon review, DOE is now disclosing.” Attached to that e-mail was a 16-page PDF document.

Date: June 8, 2020

/s/ Alexandra Perloff-Giles  
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